

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA,
INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

**PLAINTIFF HEADWATER RESEARCH LLC’S AMENDED OBJECTIONS AND
RESPONSES TO DEFENDANTS’ FIRST SET OF REQUESTS FOR ADMISSION (NOS.
1-40)**

Pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, Plaintiff Headwater Research LLC (“Headwater”) provides amended responses to Defendants Samsung Electronics Co., Ltd. (“SEC”) and Samsung Electronics America, Inc.’s (“SEA”) (collectively, “Samsung”) Requests for Admission (the “Requests”) as follows:

Headwater’s search for information is ongoing. Headwater reserves the right to rely on facts, documents, or other evidence that may develop or come to Headwater’s attention at a later time. Headwater’s responses are based on information presently known to Headwater and are set forth without prejudice to Headwater’s right to assert additional objections and/or supplementary responses should Headwater discover additional documents, information or grounds for objections. Headwater reserves the right to supplement or amend its responses to the Requests at any time prior to the trial in this action.

Headwater's Asserted Patents.

Subject to and without waiving the foregoing General and Specific Objections, and to the extent that it understands this Request, Headwater responds as follows:

Admit.

REQUEST FOR ADMISSION NO. 7:

Admit that Headwater has never sold any physical devices (e.g., mobile phones).

RESPONSE TO REQUEST NO. 7

In addition to Headwater's General Objections, which are incorporated by reference as though fully set forth herein, Headwater further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including as to "sold."

Subject to and without waiving the foregoing General and Specific Objections, and to the extent that it understands this Request, Headwater responds as follows:

Admit.

REQUEST FOR ADMISSION NO. 8:

Admit that ItsOn has never sold any physical devices (e.g., mobile phones).

RESPONSE TO REQUEST NO. 8

In addition to Headwater's General Objections, which are incorporated by reference as though fully set forth herein, Headwater further objects to this Request on the grounds that it is vague, ambiguous, and overbroad, including as to "sold."

Subject to and without waiving the foregoing General and Specific Objections, and to the extent that it understands this Request, Headwater responds as follows:

Deny.

Dated: March 26, 2025

Respectfully submitted,

/s/ Jason Wietholter

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